

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE PETITION OF  
QWEST CORPORATION'S REQUEST FOR  
WAIVER OF THE NANPA'S DENIAL OF  
APPLICATION FOR NEW CENTRAL OFFICE  
CODE IN AREA CODE 208 FOR CITIGROUP IN  
MERIDIAN, IDAHO.**

**CASE NO. QWE-T-04-10****ORDER NO. 29524**

On May 24, 2004, Qwest Corporation filed a Petition for Waiver regarding the denial of an Application Qwest previously filed with Neustar, the North American Number Plan Administrator (NANPA). On May 4, 2004, Qwest submitted an Application to Neustar requesting a new central office telephone prefix (NXX-) in its Meridian rate center. Qwest made the request for an additional NXX code because it "does not have sufficient numbering inventory in [the Meridian] rate center to provide the full NXX code requested by" a new customer—Citigroup. Petition at ¶ 7. Citigroup is locating a call center in Meridian and requested a full NXX so it could use dedicated direct inward dialing (DDID)<sup>1</sup> service provided by Qwest. *Id.* at ¶ 6. As outlined in greater detail below, we grant Qwest's Petition.

**THE PETITION**

Because Qwest did not have an entire NXX prefix available in Meridian, it filed an Application with Neustar to obtain a new prefix. In its Application to Neustar, Qwest was required to submit a "months-to-exhaust" (MTE) worksheet which indicates when Qwest would deplete or exhaust its numbering resources in the Meridian rate center. Qwest calculated that its existing prefixes would be exhausted (i.e., run out of telephone numbers) in approximately eight months.

Neustar denied Qwest's Application for a full NXX. Based upon the Federal Communication Commission's *Number Optimization Order*,<sup>2</sup> Neustar cannot assign a new prefix unless the applicant demonstrates that its existing numbering inventory will exhaust within six

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<sup>1</sup> DDID is a feature of a PBX or Centrex telephone system that allows a caller to directly dial an internal telephone number.

<sup>2</sup> *In the Matter of Numbering Resource Optimization, Petition for Declaratory Ruling and Request for Expedited Action*, CC Docket Nos. 99-200 and 96-98 (March 31, 2000).

months of the Application. *See also* 47 C.F.R. § 52.15(g)(3)(B)(iii). Consequently, Neustar denied Qwest's Application.

As provided in the *Number Optimization Order* and FCC regulations, the appropriate regulatory Commission "may affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource" requirements. 47 C.F.R. § 52.15(g)(3)(B)(iv). Qwest maintains that NANPA's denial of a new NXX code impedes Qwest's ability to serve Citigroup. Qwest notes that its MTE criteria is merely two months above the six-month threshold. In its NANPA Application, Qwest notes that the Meridian rate center has grown by 1,657 lines in the previous six months. Petition, Att. A. Moreover, the lack of a numbering prefix hinders Citigroup's plans to use Qwest's DDID service.

### **STAFF ANALYSIS**

Staff recommended that the Commission grant Qwest's request. Staff noted that Meridian and its surrounding area is undergoing significant population growth. The growth and population comports with the increase in the number of telephone lines and the fact that Qwest's MTE criteria is only two months above the six-month exhaust threshold. According to Qwest's NANPA Application, it has added 1,657 access lines to the Meridian rate center in the prior six months. Staff also noted that Qwest participates in thousand-block-pooling in the Meridian rate center. Thus, unused blocks are returned to Neustar for assignment. Taking these factors together, Staff concluded that granting the Petition will not result in an inefficient use of Idaho's numbering resources.

### **DISCUSSION**

After reviewing Qwest's Petition and Staff's recommendation, the Commission finds that Qwest's Petition should be granted. It appears that the requested NXX is necessary for Qwest to meet the needs of Citigroup. Granting the request will facilitate Citigroup's desire to use Qwest's DDID service. The Commission also notes that the MTE criteria was only exceeded by two months. As Staff reported, this area is undergoing significant growth. Finally, because Qwest participates in number pooling, unused 1,000 blocks will be returned to the NANPA. Consequently, we find that it is reasonable to direct that Neustar provide a new NXX prefix as requested by Qwest to meet the customer requirements of Citigroup.

## ORDER

IT IS HEREBY ORDERED that Qwest Corporation's Petition for Waiver of the Neustar decision is granted.

IT IS FURTHER ORDERED that Neustar assign an NXX prefix to Qwest in the Meridian rate center.

THIS IS A FINAL ORDER. Any person interested in this Order (or in issues finally decided by this Order) or in interlocutory Orders previously issued in this Case No. QWE-T-04-10 may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order or in interlocutory Orders previously issued in this Case No. QWE-T-04-10. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. See *Idaho Code* § 61-626.


DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 9<sup>th</sup> day of June 2004.

  
PAUL KJELLANDER, PRESIDENT

  
MARSHA H. SMITH, COMMISSIONER

  
DENNIS S. HANSEN, COMMISSIONER

ATTEST:

  
Jean D. Jewell  
Commission Secretary

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